

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

FIREMAN'S FUND INSURANCE COMPANY,  
as subrogee of City of Racine,

Case No.21-CV-642-PP

Plaintiff,

v.

RACINE ZOOLOGICAL SOCIETY,

Defendant/Third-Party Plaintiff,

v.

CHINA LANTERN INTERNATIONAL, LLC d/b/a  
ZIGONG LANTERN GROUP, a dissolved North  
Carolina Limited Liability Company.

Third-Party Defendant.

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**JOINT MOTION FOR PROTECTIVE ORDER**

Plaintiff, Fireman's Fund Insurance Company, as subrogee of City of Racine, Defendant/Third-Party Plaintiff, Racine Zoological Society, and Third-Party Defendant, China Lantern International, LLC d/b/a Zigong Lantern Group, a dissolved North Carolina LLC (collectively referred to herein as the "Parties"), stipulate and agree that the terms and conditions of the proposed Protective Order attached hereto are applicable to and govern depositions, documents and tangible things produced in response to requests for production thereof, answers to interrogatories, responses to requests for admissions, and all other discovery taken pursuant to applicable rules governing discovery, as well as testimony adduced at trial, matters in evidence, and other information and documents exchanged by the parties in the captioned action or produced by a third party, which the disclosing party designates as CONFIDENTIAL or ATTORNEYS' EYES ONLY. The stipulation and agreement will permit the parties to exchange sensitive

documents and information in an effort to narrow the issues and facilitate prompt resolution of this matter.

Accordingly, the Parties respectfully request that the Court grant this motion and enter the Protective Order attached hereto.

Respectfully Submitted,

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Dated: August 27, 2021  
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